

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE C.R. BARD, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	MDL 2187
IN RE: AMERICAN MEDICAL SYSTEMS, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	MDL 2325
IN RE BOSTON SCIENTIFIC CORP., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	MDL 2326
IN RE ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	MDL 2327
THIS DOCUMENT RELATES TO ALL CASES	

MOTION FOR SUBSTITUTION AND WITHDRAWAL OF COUNSEL

TO THE HONORABLE JUDGE OF THIS COURT:

PLEASE TAKE NOTICE that TorHoerman Law LLC, by and through its undersigned counsel, respectfully moves this Court for entry of an order withdrawing R. Joseph Kramer, the current counsel for clients in the above-referenced matter, and substituting R. Joseph Kramer with attorney Steven D. Davis as counsel in MDL numbers 2187, 2325, 2326, and 2327.

Accordingly, TorHoerman Law LLC respectfully requests that the Court enter an order withdrawing R. Joseph Kramer as counsel and substituting Steven D. Davis as counsel, as well as updating each member case in which any of the named attorneys have been associated in MDL numbers 2187, 2325, 2326, and 2327.

Dated: June 30, 2017

By: s/ R. Joseph Kramer

R. Joseph Kramer, Esq.

IL Bar No.: 6310601

TORHOERMAN LAW LLC

227 West Monroe Street, Suite 2650

Chicago, IL 60606

Phone: (312) 372-4800

Fax: (312) 284-4914

joe@thlawyer.com

AND

By: s/ Steven Davis

Steven D. Davis, Esq.

IL Bar No.: 6281263; MO Bar No. 56281;

CA Bar No. 249633

TORHOERMAN LAW LLC

101 W. Vandalia Street, Suite 350

Edwardsville, IL 62025

Phone: (618) 656-4400

Fax: (618) 656-4401

SDavis@thlawyer.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on June 30, 2017, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

By: s/ R. Joseph Kramer
R. Joseph Kramer, Esq.
Illinois Bar Number: 6310601
TORHOERMAN LAW LLC
227 West Monroe Street, Suite 2650
Chicago, IL 60606
Phone: (312) 372-4800
Fax: (312) 284-4914
joe@thlawyer.com
Attorney for Plaintiffs